DIVERGENT LEARNING COMMUNITY CIC

Artificial Intelligence Safeguarding Policy

Policy and Procedure Document

Document Version: Version 2.0

Effective Date: February 2026 (updated 18 November 2026)

Review Date: May 2027

Responsible Person: Claudia Celi, Founder

Document Status: Active

1. Purpose and Scope

Divergent Learning Community CIC (DLC) uses Artificial Intelligence (AI) tools, including generative AI, to support educational delivery, cognitive profiling, and administrative processes. This policy establishes our framework for ensuring that all AI use at DLC is ethical, rights-based, transparent, and places the safeguarding of children at its centre.

As AI capabilities grow rapidly — with significant improvements in performance occurring every few months — DLC recognises that safeguarding frameworks must be built in from the ground up, not retrofitted after the fact. This policy reflects our commitment to ensuring that technological advancement serves children's rights and wellbeing, never at their expense.

This policy applies to all AI tools and systems used by DLC, all community members using AI in connection with DLC activities, and all AI-generated content relating to children, families, or DLC operations.

2. Our Values and Approach to AI

DLC's use of AI is grounded in our core values:

- Rights-Based: Children's rights under the UN Convention on the Rights of the Child are paramount. AI is a tool that must serve children's rights, not override them.
- Transparency: Families and children are informed about how AI is used, what data is processed, and what decisions AI informs.
- Human Accountability: AI outputs are always reviewed by a human community member before any action is taken. No decision affecting a child is made by AI alone.
- Strengths-Based: AI is used to identify and celebrate cognitive strengths, never to label, categorise, or pathologise children.
- Proportionality: AI is used only where it genuinely enhances outcomes for children. We do not use AI for its own sake.
- Continuous Review: Given the pace of AI development, this policy is reviewed every six months to ensure it remains current and fit for purpose.

3. Legal and Regulatory Framework

This policy complies with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Children and the UK GDPR (ICO Guidance)
- Keeping Children Safe in Education (KCSIE) (latest statutory guidance)
- UN Convention on the Rights of the Child
- ICO Guidance on AI and Data Protection
- Equality Act 2010
- Human Rights Act 1998

4. How DLC Uses AI

4.1 Approved Uses of AI at DLC

DLC currently uses AI in the following ways:

- Cognitive Profiling: Analysing anonymised, redacted educational documents to identify children's reasoning strengths across the MIND strengths framework (Material, Interconnected, Narrative, Dynamic). Only text redacted using DLC's checklist is ever entered, in an incognito chat with model training switched off. All AI-generated profiles are reviewed and refined by a human community member before use.
- Educational Planning: Generating learning activity ideas, resource suggestions, and differentiation strategies tailored to anonymous strengths pathways. No child's name, profile or identifying details are ever entered.
- Administrative Support: Drafting policies, communications, and operational documents. All AI-drafted documents are reviewed and approved by the Founder before use.
- Research: Any future research use of DLC data would require university research ethics approval and separate, opt-in consent from families.

4.2 Prohibited Uses of AI at DLC

The following uses of AI are strictly prohibited at DLC:

- Making any decision about a child's placement, progress, or welfare without human review and approval.
- Processing identifiable personal data about children through AI systems without explicit parental consent and appropriate data protection measures.
- Using AI to assess, judge, or make inferences about a child's character, behaviour, or potential in deficit-model terms.
- Using AI-generated content with children or families without human review.
- Sharing children's data with AI systems that do not meet DLC's data protection requirements.
- Using AI to replace human relationships, judgement, or safeguarding responsibilities.

5. Children's Rights and AI

DLC is committed to upholding children's rights in all AI-related activities. Children and families have the following rights:

5.1 Right to Know

Children and families have the right to be informed, in clear and accessible language, about how AI is used at DLC, what data is processed, and how AI outputs influence decisions about their child.

5.2 Right to Human Review

No decision affecting a child is made solely on the basis of AI output. Every AI-generated cognitive profile, recommendation, or assessment is reviewed by a qualified human community member before it is acted upon or shared.

5.3 Right to Opt Out

Families may request that AI tools are not used in the processing of their child's educational documents or cognitive profiling. In such cases, DLC will discuss alternative approaches to cognitive profiling that do not involve AI. DLC's ability to create a cognitive profile may be affected, and this will be discussed openly with the family.

5.4 Right to Explanation

Families have the right to request a clear explanation of any AI-generated cognitive profile or recommendation relating to their child, including the basis on which it was produced and any limitations.

5.5 Right to Rectification

Families may request correction of any inaccurate information in AI-generated profiles. DLC will investigate and correct within 30 days.

6. Data Protection and AI

6.1 Data Minimisation

DLC processes the minimum personal data necessary through AI systems. Educational documents are fully redacted of all personal identifiers before being processed through AI tools. See DLC's Educational Document Redaction and Cognitive Profiling Policy for full details.

6.2 Approved AI Tools

DLC currently uses Claude AI by Anthropic for cognitive profiling and administrative support. This tool has been selected because:

- Model training can be switched off in the account settings, and DLC's account has it switched off ("Help improve our AI models": off).

- Anthropic has published transparency commitments regarding data use and safety.
- The tool complies with DLC's data protection requirements when used with fully redacted text in incognito chats.

Any change to approved AI tools requires review against DLC's data protection requirements and must be approved by the Founder before adoption.

6.3 Data Retention

Redaction work takes place in incognito chats, which are not saved to the chat history, and feedback buttons are never used in these chats. Because only redacted text is entered, no identifying data about children is placed in AI systems. DLC does not use AI platforms that use children's data for model training.

6.4 International Data Transfers

Where AI tools involve international data transfers (e.g., cloud processing in the USA), DLC ensures that appropriate safeguards are in place in accordance with UK GDPR requirements, including adequacy decisions or standard contractual clauses.

7. Safeguarding and AI

7.1 AI Does Not Replace Safeguarding Judgement

AI tools are never used to assess safeguarding risk, make safeguarding decisions, or replace the professional judgement of the Designated Safeguarding Lead. If AI-processed documents reveal information that raises safeguarding concerns, DLC's standard safeguarding procedures are followed immediately. See DLC's Safeguarding Policy for full details.

7.2 Bias and Fairness

DLC recognises that AI systems can reflect and amplify biases present in their training data. This is of particular concern in an educational context where biased outputs could disadvantage already marginalised children. DLC mitigates this risk by:

- Always applying a strengths-based lens when interpreting AI outputs.
- Requiring human review of all AI-generated profiles before use.
- Actively questioning AI outputs that appear to reflect deficit-model thinking.
- Regularly reviewing AI outputs for patterns that may indicate bias.
- Maintaining a log of concerns about AI outputs and reporting these to the Founder.

7.3 Algorithmic Transparency

DLC uses AI tools that publish information about how they work. Where AI reasoning is opaque or unexplainable, DLC does not rely on that output without significant human review and interpretation.

8. Roles and Responsibilities

8.1 Founder

- Overall responsibility for AI safeguarding policy and compliance.
- Approval of all AI tools used at DLC.
- Review and approval of all AI-generated content before external use.
- Six-monthly policy review.

8.2 All Community Members

- Using AI only for approved purposes and in accordance with this policy.
- Reviewing all AI outputs before acting on them or sharing them.
- Reporting concerns about AI outputs or potential policy breaches to the Founder.
- Completing AI safeguarding training as required.

8.3 Parents and Families

- Providing informed consent for AI use in processing their child's documents.
- Raising concerns about AI use with the Founder at any time.
- Exercising their rights under this policy and UK GDPR.

9. Transparency with Children and Families

DLC is committed to being open about its use of AI. We communicate with families about AI use through:

- Information provided during the application process, including this policy.
- The Parental Consent Form, which includes specific consent for AI-assisted cognitive profiling.
- Age-appropriate explanations for children about how their learning profiles are created.
- Ready availability of this policy on the DLC website.
- Willingness to discuss AI use openly with any family at any time.

10. AI and the Rapidly Changing Landscape

AI is one of the fastest-evolving technologies of our time. DLC recognises that safeguarding frameworks must keep pace with this development, which is why this policy is reviewed every six months rather than annually. AI capabilities are developing at an extraordinary pace. DLC recognises that the safeguarding implications of AI in education are evolving, and that policies written today may need significant revision as technology changes.

DLC commits to:

- Reviewing this policy every six months, rather than annually, to reflect the pace of change.

- Monitoring developments in AI regulation, including ICO guidance and government policy.
- Participating in and contributing to sector discussions about AI safeguarding in education.
- Incorporating relevant research findings on rights-based AI in education.
- Never adopting new AI tools or expanding AI use without first assessing the safeguarding implications.

DLC's position is clear: the speed of AI development makes robust, rights-based safeguarding frameworks more important, not less. We will not allow the pace of technological change to outstrip our commitment to children's safety and rights.

11. Training and Competence

All community members who use AI tools at DLC must complete training covering:

- DLC's approved uses of AI and this policy.
- Data protection requirements when using AI tools.
- Recognising and responding to AI bias.
- Human review requirements before acting on AI outputs.
- Reporting concerns about AI outputs.

Training is provided during induction and updated when this policy is reviewed or significant AI developments occur.

12. Complaints and Concerns

Any community member, child, or family with a concern about DLC's use of AI should raise it with the Founder in the first instance. Concerns will be investigated promptly and a written response provided within 14 days.

Families who are not satisfied with DLC's response may escalate their concern to the Information Commissioner's Office (ICO) in relation to data protection matters.

13. Monitoring and Review

This policy is reviewed every six months by the Founder, or sooner if:

- Significant AI developments occur that affect DLC's practice.
- New ICO guidance or legislation is published.
- A concern or complaint is received about AI use.
- DLC adopts new AI tools or expands its use of AI.

14. Key Contacts

Internal:

Founder and AI Lead: Claudia Celi | DivergentLearningCommunity@outlook.com

External:

Information Commissioner's Office (ICO): 0303 123 1113 | www.ico.org.uk

Anthropic (Claude AI): www.anthropic.com

Document Approval

Prepared by: Claudia Celi
Position: Founder
Date: 25 February 2026

Reviewed by: Claudia Celi
Position: Founder
Date: 25 February 2026

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This policy was first approved on 25 February 2026, updated on 18 November 2026 (version 2.0), and will be reviewed by 18 May 2027.

Divergent Learning Community CIC is committed to the ethical, rights-based, and transparent use of Artificial Intelligence.